

August 20, 2003

Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street SW, Room TW-A325  
Washington, DC 20554

Dear Ms Dortch:

The following is Colorado State University's Response to the FCC'S Notice of Proposed Rulemaking, WT Docket No. 03-66, RM-10586, "Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and other Advanced Services in the 2150-3162 and 2500-2690 Mhz Bands":

Colorado State University is the holder of a license for ITFS spectrum. We have read the Notice of Proposed Rulemaking in detail, and have thought deeply about it. Per your request, we offer the following comments:

1. In our region of the country, the "digital divide" is a reality. Broadband access to the home is available to only a limited number of our constituents, and we do not view this situation changing significantly in the next decade. Therefore, wireless technology is the only way that a large number of our constituents will ever receive high-speed Internet services. Wireless transport is therefore essential to our educational mission.
2. As we deliver more and more multimedia via the Internet, our Internet traffic and associated costs continue to grow dramatically. In fact, we are relying on the revenue that we anticipate obtaining from leasing a portion of the ITFS spectrum for which we hold a license in order to meet these increasing costs. Indeed, the growth in traffic and associated increase in costs will in part be due to the greater "reach" provided by high-speed wireless technology delivered over our ITFS spectrum.

We therefore urge the FCC to consider these aspects as it embarks upon its rulemaking. Preservation of ITFS licenses is the only manner in which we can provide access to educational material to a broad constituency. Furthermore, "converged" services will be delivered via IP in a secure, reliable, proven and seamless fashion over ITFS spectrum. Finally, we are relying on the revenue that we anticipate garnering from the leasing of a portion of the spectrum for which we hold a license, in order to meet the increasing costs of delivering education via the Internet. We also want to indicate that we endorse and completely support the band plan and rule change proposals set forth in the White Paper submitted by the NIA/CTN/WCA Coalition, and as amplified by their comments to be filed on this NPRM. Thank you for your consideration in this matter.

Sincerely,

Thomas G. Maher, Ph.D  
Director